

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
FTX TRADING LTD., <i>et al.</i> , ¹	Case No. 22-11068 (KBO)
Debtors.	(Jointly Administered)
Hearing Date: September 11, 2025 at 1:00 p.m. (ET) Objection Deadline: September 4, 2025 at 4:00 p.m. (ET)	
Ref. Nos. 31797 & 31806	

**CERTIFICATION OF COUNSEL REGARDING FTX RECOVERY TRUST'S
ONE HUNDRED NINETIETH (SUBSTANTIVE) OMNIBUS OBJECTION TO
CERTAIN OVERSTATED AND/OR UNLIQUIDATED PROOFS OF
CLAIM (CUSTOMER CLAIMS)**

I, Matthew R. Pierce, counsel to the FTX Recovery Trust², hereby certify as follows to the best of my knowledge, information and belief:

1. On July 22, 2025, the FTX Recovery Trust filed the *FTX Recovery Trust's One Hundred Ninetieth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims)* [D.I. 31797, redacted & 31806, sealed] (the "Objection").
2. Pursuant to the Notice of Objection [D.I. 31797-1 & 31806-1], any responses were to be filed no later than September 4, 2025, at 4:00 p.m. (ET) (the "Response Deadline").
3. The FTX Recovery Trust received an informal response from Jerry McGuffin ("McGuffin") and, on September 2, 2025, McGuffin filed a response to the Objection [D.I. 32638] (the "McGuffin Response").

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors' confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

4. The FTX Recovery Trust received an informal response to the Objection from the holder of claim number 49501.

5. As of the Date hereof, no other responses to the Objection have been filed or served on the FTX Recovery Trust.

6. The FTX Recovery Trust has revised the proposed form of order (the “Revised Order”), a copy of which is attached hereto as **Exhibit A**, to reflect the adjournment of the Objection solely with respect to the McGuffin Response and claim number 49501. A copy of the Revised Order compared against the proposed form of order attached to the Objection is attached hereto as **Exhibit B**. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

7. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Revised Order at its earliest convenience.

Dated: September 16, 2025
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
Christian P. Jensen (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com
jenc@sullcrom.com

Counsel to the FTX Recovery Trust